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\*Motion pro hac vice granted 9/9/11.  
\*\*Motion pro hac vice granted 6/11/12.  
\*\*\*Motion pro hac vice granted 2/1/16.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
HELENA DIVISION

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**Lair, et al.,**

*Plaintiffs,*

v.

**Jonathan Motl, et al.,**

*Defendants.*

Case No. 6:12-cv-00012-CCL

**Declaration of Scott Sales**

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I, Scott Sales, make the following declaration pursuant to 28 U.S.C. § 1746:

**DECLARATION OF  
SCOTT SALES**

1. I am over eighteen years of age and my statements set forth below are based on personal knowledge.

2. In 2002, I successfully ran for office in House District 27. I was re-elected in 2004, 2006, and 2008. In 2007, I served as Speaker of the House. In 2009, I was the GOP Republican Leader.

3. In 2010, because I was term-limited, I ran for County Commissioner. County commissioners are essentially county managers, addressing issues such as fiscal matters, land transfers, zoning, and road plowing. They do not deal with gun, abortion, or right-to-work issues.

4. I have long been an advocate of right-to-work, and voted in favor of it in an Idaho referendum in 1986.

5. For my 2010 campaign, I believe either Christian LeFer or a fellow Republican recommended that I use Direct Mail for my campaign literature. I decided to do so, and paid for a wife letter and two campaign letters.

6. When I ran for senate in Senate District 34 in 2012, I didn't use Direct Mail because I was dissatisfied with the 2010 product. I felt I had overpaid for poor quality materials that were not mailed out on time.

7. A complaint was filed against me with the Office of the Commissioner of Political Practices in January 2013 alleging coordination in the

production of the 2010 wife letter. I was investigated and the matter was dismissed by Commissioner Murry in April 2013. Commissioner Motl reopened that matter in January 2014 as against all campaign materials I paid for from Direct Mail as well as third party mailers, and issued sufficiency findings against me in April 2014. He filed a civil suit against me thereafter. I settled the matter for \$500 though I believe I engaged in no wrongdoing other than keeping all my records for four years. None of these filings raised the issue of quid pro quo corruption. The first I heard of it was recently in the newspaper.

**8.** At no point during any of my campaigns did I authorize any National Right to Work, American Tradition Partnership, or Western Tradition Partnership spending to aid in my election. I never met with National Right to Work, American Tradition Partnership, or Western Tradition Partnership, or their agents for the purpose of being vetted.

**9.** I have never made an arrangement, explicit or implied, with Western Tradition Partnership, American Tradition Partnership, National Right to Work, or Direct Mail that, in exchange for any efforts to get me elected, I would act in an official government capacity at their direction as a public official.

**10.** I have never and would never enter into such an agreement with anyone. Nor am I aware of any other legislator or candidate doing so.

I swear under the penalty of perjury that the foregoing is true and correct.

Executed on March 31, 2016.



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